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Attorney for Debtors

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re: Stanley F.Kleinschmidt, Jr. and
Corinne A. Kleinschmidt,
Debtors

Case No.: 09-13545 NLW
Chapter 7
Hearing Date: March 8, 2010
Time: 9:00 a.m.

**NOTICE OF MOTION TO RELIEVE THE ATTORNEY THEREIN OF
COUNSEL FOR CHAPTER 7 BANKRUPTCY PROCEEDING ON BEHALF OF
STANLEY F. KLEINSCHMIDT, JR. AND CORINNE A. KLEINSCHMIDT**

TO:

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2424 Edgemore Avenue
Easton, PA 18045

American Express Centurion Bank
c/o Becket and Lee LLP
POB 3001
Malvern PA 19355-0701

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c/o Global Vantage
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505 Eighth Ave
New York, NY 10018

Firestone
c/o Client Services, Inc.
3451 Harry Truman Blvd
Saint Charles, MO 63301

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Department of the Treasury
Internal Revenue Service
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Philadelphia, PA 19114

PLEASE TAKE NOTICE that on **March 8, 2010 at 9:00 am** or as soon as thereafter as counsel may be heard, the undersigned attorney for the Debtors shall move before the Honorable Novalyn L. Winfield for an Order relieving Garces & Grabler P.C. and the undersigned from representing Stanley Kleinschmidt and Corinne Kleinschmidt.

PLEASE TAKE FURTHER NOTICE that movant shall rely upon the annexed Certification of Counsel.

PLEASE TAKE FURTHER NOTICE that the movant waives Oral Argument. However, if the Court requires Oral Argument, a hearing will be held on **March 8, 2010 at 9:00 am** in Courtroom **3D** United States Bankruptcy Court, MLK Jr. Federal Bldg., 50 Walnut Street, 3rd Floor, Newark, New Jersey.

PLEASE TAKE FURTHER NOTICE that unless timely responsive papers are filed in accordance with the appropriate rules, the Court may decide that the relief sought in the motion are unopposed and may enter an order granting that relief.

Dated: February 9, 2010

/s/Michael R. Speck

Michael R. Speck, Esq.